



Mark Whitworth
Comments on H.40
House Committee on Natural
Resources and Energy
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- Energize Vermont supports targets to reduce Vermont's GHG emissions.
- We do not favor renewable electricity targets, like the ones in H.40.
 - Our consumption of electricity represents only a small part—5%—of our carbon footprint. And that's only the carbon footprint that we acknowledge.
 - Our actual carbon footprint is far larger than the footprint that we account for. Most of the goods and services we buy come with carbon investments that were made elsewhere.
 - Many of these carbon investments result from lifestyle choices. Consider the consumption of meat in Vermont: it has a carbon footprint three times the footprint of our electricity consumption.
 - Since much of our meat is brought in from out of state, this doesn't even show up in the state's carbon accounting.
 - If Vermont were to adopt a tradition of one meatless day per week, it would save 2-1/2 times as much carbon as GMP claims for its industrial turbine complex in Lowell.
 - GMP claims that the Lowell complex avoids 74,000 tons of carbon each year. This is a gross overstatement, but suppose it were true— that would mean that each year Lowell would offset about a half a day's worth of emissions from Metro New York traffic.
 - That would mean that if Lowell operated for 20 years, it would offset emissions from less than two weeks' worth of NYC traffic.
 - For those meager savings, we destroyed irreplaceable wildlife habitat in Vermont— wildlife habitat that we should be preserving in order to assure the survival of species as they adapt to a changing climate.
 - That is why we don't support renewable electricity targets—they have caused great environmental destruction and social disruption in Vermont.
- While we appreciate the provisions of H.40 that encourage small, distributed generation, there is nothing in the bill to curb the environmental destruction and social disruption caused by industrial wind installations and poorly-sited solar projects. For these reasons, we could not support H.40 unless it were to include provisions to protect our communities and our natural resources from poor siting choices.
- Here are some changes that we would recommend for H.40:
 1. In order to contribute to RESET targets, a generation facility must be the result of a collaborative stakeholder process and must comply with regional and municipal plans.

2. In order to be considered for Category-1 eligibility, developers who propose an in-state generation facility should be required to:
 - a. demonstrate that it is a least-cost option
 - b. provide a lifecycle accounting of both its carbon investment and carbon savings
3. The bill contains a loophole that would enable a utility to exceed the 5MW capacity limit on Category-2 generators. This loophole is unnecessary and should be removed.
4. In order to qualify for Category-2, a generating facility cannot fragment forestlands, utilize prime agricultural soils, be located in wetlands, or threaten wetlands or headwaters.
5. Electricity generation projects that not required for reliability and are not required to meet RESET requirements should be considered speculative commercial ventures and should be evaluated under Act 250.

